

United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER PAUL WINGO,

Defendant.

CRIMINAL COMPLAINT

Case No. 22-MJ-112-JAR

I, Special Agent Laura Luppens, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about March 5, 2022, in the Eastern District of Oklahoma, defendant, **CHRISTOPHER PAUL WINGO**, committed the crimes of Assault with a Dangerous Weapon with Intent to do Bodily Harm, in violation of Title 18, United States Code, Section 113(a)(3), and Use, Carrying, Brandish, and Discharge of a Firearm During and in Relation to a Crime of Violence, in violation of Title 18, United States Code, Section 924(c).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Special Agent Laura Luppens, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.



Laura Luppens
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: April 18, 2022

JASON A. ROBERTSON
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Laura Luppens, being duly sworn, depose and state that:

INTRODUCTION

I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since May 2017. I am currently assigned to the FBI Oklahoma City Division, Muskogee Resident Agency, where I investigate violations of federal law. My initial training consisted of a 21-week Basic Field Training Course conducted at the FBI Academy at Quantico, Virginia, during which I received instruction on various aspects of federal criminal investigations, to include training on criminal procedure, search and seizure, and violent crimes. Since then, I have received ongoing training from the FBI in criminal investigations. I am presently assigned to work primarily Indian Country criminal investigations in the Eastern District of Oklahoma.

As a federal law enforcement officer, I am authorized by the Attorney General to investigate violations of the laws of the United States, and to request and execute warrants issued under the authority of the United States.

I make this affidavit in support of a criminal complaint charging CHRISTOPHER PAUL WINGO (hereinafter "WINGO") with violations of Title 18 U.S.C. § 113(a)(3), assault with a dangerous weapon with intent to do bodily harm; and Title 18 U.S.C. § 924(c), using or carrying a firearm during and in relation to any crime of violence.

The statements contained in this Affidavit are based on written reports and documents related to this investigation that I have received, directly or indirectly, from other law enforcement officers; information provided by other agencies; publicly available information; my own investigation into this matter; and my experience, training, and background as a Special Agent

with the FBI. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, I have not included each and every fact known to me about this matter; rather, I have set forth only the facts that I believe are necessary to support probable cause for the lawful arrest of WINGO. In addition, unless otherwise indicated, all statements contained in this affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

PROBABLE CAUSE

As will be shown below, there is probable cause to believe that on March 5, 2022, WINGO rammed victim J.B.'s truck with his truck from behind, and then repeatedly discharged a firearm pointed at J.B., an enrolled member of the Choctaw Nation of Oklahoma with a Certificate of Degree of Indian Blood. The incident occurred on or in the vicinity of J.B.'s property, which is located in the Eastern District of Oklahoma and within the geographic boundaries of the Muscogee Nation Reservation, in violation of Title 18 U.S.C. §§ 113(a)(3) and 924(c).

DEFENDANT: The defendant in this matter is CHRISTOPHER PAUL WINGO (WINGO), date of birth September 9, 1967, who is not a known member of a Federally Recognized Tribe.

VICTIM: The victim in this matter is J.B., date of birth (xx/xx/1991), an enrolled member of the Choctaw Nation of Oklahoma with a Certificate of Degree of Indian Blood.

VENUE: The facts and circumstances alleged in this affidavit occurred on and around J.B.'s family's property in Lamar, Oklahoma, located within the Eastern District of Oklahoma. More specifically, based on the Supreme Court decision in *McGirt v. Oklahoma* (2020), the location where this incident occurred is within the geographic boundaries of the Muscogee Nation Reservation, and therefore is within Indian Country.

Below is a summary of events that occurred on March 5, 2022, on and in the vicinity of J.B.'s family's property in Lamar, Oklahoma, based on my own investigation and my review of reports, crime scene photographs, court documents, and other information received from the Hughes County Sheriff's Office (HCSO):

J.B. and his wife, M.B., were unloading a trailer of corn on a well pad in their pasture when they saw WINGO driving down their pasture road in his truck. M.B. immediately called 911, because WINGO had been harassing J.B. and their family for more than a year. J.B. got in his truck and drove towards WINGO. WINGO drove off the road, circled around behind J.B.'s truck, and then rammed the back of J.B.'s truck with his truck. WINGO's truck became stuck to the hay spikes on the back of J.B.'s truck. WINGO then got out of his truck and began shooting at J.B. while J.B. was still seated in the driver's seat of J.B.'s truck. J.B. drove off in his truck with WINGO's truck still attached. WINGO then began to run alongside the trucks, continuing to shoot at J.B. J.B. drove to his great grandmother's home and stopped. WINGO continued on foot toward J.B. WINGO and J.B. exchanged words, and then HCSO deputies arrived on scene.

A written statement obtained by HCSO from J.B. states: "Chris Wingo come driving toward me and my wife on the well pad I got in my truck and went towards him he started to chase me in his truck he then ran into the back of my truck and his truck got stuck to mine he then started shooting at me and I took off dragging his truck and he was running beside me shooting at me I drove up to my great grandmas and stopped He walked up the road towards us with my aunt."

A written statement obtained by HCSO from J.B.'s wife, M.B., reads as follows (it should be noted, the victim, J.B.'s middle initial is T, and his wife calls him by his middle name): "[T.B.] and I were unloading a trailor [sic] of corn on a well pad in our pasture we noticed Chris Wingo coming Down our pasture road [T.] got into his Feed truck went around Chris Wingo. Chris then

rammed [T.'s] Feed Truck, Wingo gets out of his truck and started Firing his Gun into my Husband's Truck While I am on the phone with 911. At this point my Husband [T.] takes off down the road in the Feed truck with Chris Wingo's truck stuck to it by the hay Spikes. I then walk Down the Dirt road See Chris Wingo with the Gun in his hand. I Continue to walk down the Dirt road where my husband ([T.]) is parked. Chris continues to follow me up the dirt road where [T.] is stopped They then exchange words with each other and the Sheriffs show up and deescalate the situation."

Two other witnesses reported that they heard gunshots and then saw WINGO holding a firearm; one witness described the firearm in a written statement as a "gun", another as a "pistol". One of these witnesses, K.G., said that after hearing gunshots, she ran to the scene to make sure no one was hurt, and WINGO handed her his gun.

After arriving on scene, HCSO deputies ordered everyone down on the ground and placed WINGO in handcuffs, based on information they had received that he was the one shooting at J.B. K.G. told one of the Deputies that WINGO's gun was in the grass a few feet away from her, where she had put it. The deputy located the gun, a Llama .357 magnum revolver, in the grass and secured it in a patrol vehicle. The deputy determined that the recovered revolver was loaded with five spent ammunition cartridges and one unfired round of ammunition next to the chamber.

I have reviewed crime scene photographs taken by the HCSO deputies. Several photos show two white pickup trucks that appear to be stuck together, with the front of the second truck stuck to the back of the first, consistent with the victim's account. The truck in the back is a white Ford F350, flatbed, four-door pickup truck with Oklahoma license plate number TNF-060. The license plate of the truck in the front is not visible in the photographs, but it is a white Ford F250, two-door, flatbed pickup truck with a metal cow feeder in the back, behind the cab.

The crime scene photographs show what appear to be two bullet holes in the cow feeder behind the driver's seat of the victim's truck. There are multiple photographs of the Llama .357 magnum revolver, with all six cartridge chambers of its cylinder filled with ammunition cartridges. Photographs of the six ammunition cartridges, once removed from the revolver, show that five were empty cartridge casings and one was an unfired round of ammunition.

After conducting their on-scene investigation, HCSO deputies placed WINGO under arrest and booked him into the Hughes County Jail. WINGO was charged in the State of Oklahoma District Court of Hughes County with one violation of Title 21 Oklahoma Statutes (O.S.) § 652(A), shooting with intent to kill, and one violation of Title 21 O.S. § 645, assault and battery with a dangerous weapon. As of the date your Affiant signs this affidavit, WINGO remains in the custody of the Hughes County Sheriff's Office.

In applications for Protective Orders filed by J.B. and his wife against WINGO on March 7, 2022, J.B. and his wife stated that WINGO had been threatening and harassing them and their family since November 2020, including threatening to kill J.B.'s mother, and threatening to kill anyone who bothered WINGO's horses. HCSO deputies had responded to J.B.'s residence on March 4, 2022, one day prior to this incident, in reference to threats and harassing behavior from WINGO. HCSO deputies had recommended J.B. and his family look into getting a protective order against WINGO.

Based on my review of this case and the facts set forth above, and based on my knowledge and experience with violent crimes in Indian Country, I believe there is probable cause that CHRISTOPHER PAUL WINGO committed violations of Title 18 U.S.C. § 113(a)(3), assault with a dangerous weapon with intent to do bodily harm; and Title 18 U.S.C. § 924(c), using or carrying a firearm during and in relation to any crime of violence.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'L. Euppens', written over a horizontal line.

Laura Euppens, Special Agent
Federal Bureau of Investigation

Sworn before me this 18th day of April 2022.

A handwritten signature in blue ink, appearing to read 'Jason A. Roberts', written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF OKLAHOMA